

---

**CLIMATE FINANCE INDIA PRIVATE LIMITED**

**Grievance Redressal Policy**

---

## Table of Contents

---

<b>Glossary</b> .....	3
<b>1. Introduction</b> .....	4
<b>2. Objective</b> .....	4
<b>3. Grievance Redressal Officer (GRO) and Principal Nodal Officer (PNO)</b> .....	4
<b>4. Grievance Redressal Mechanism</b> .....	5
<b>4.1 Lodging / Registration of the Issue:</b> .....	5
<b>4.2 Escalation Mechanism</b> .....	6
<b>5. Redressal of Grievances related to Outsourced Services</b> .....	6
<b>6. Display of information</b> .....	7
<b>7. Awareness and Internal Training</b> .....	8
<b>8. Record Management</b> .....	8
<b>9. Quality Assurance</b> .....	8
<b>10. Reporting</b> .....	8
<b>11. Review of Policy</b> .....	8
<b>References</b> .....	9
<b>Annexure I</b> .....	10
<b>Annexure II</b> .....	12
<b>Annexure III</b> .....	13

## Glossary

CMS	Complaint Management System
GRO	Grievance Redressal Officer
ID	Identification
PNO	Principal Nodal Officer
Q /R /C	Query, Request, Complaint
RBI	Reserve Bank of India
TAT	Turn Around Time

## 1. Introduction

This Grievance Redressal Policy has been formulated in accordance with the Master Direction – Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025 vide its circular no. *RBI/DOR/2025-26/362 DOR.MCS.REC.No.281/01-01-039/2025-26*.

## 2. Objective

As a responsible Financial Institution, at Climate Finance India Private Limited (hereinafter referred to as the “Company”) we are committed to a transparent, respectful and inclusive environment. We recognize the importance of maintaining trust and confidence of our clients, borrowers, employees, partners, and stakeholders is imperative for our continued growth with credibility.

This Grievance Redressal Policy reflects our dedication to listening to your voice, provide a structured mechanism for addressing concerns, complaints, or grievances and resolving the issues efficiently while upholding our core values and ethical standards.

We understand that grievances may arise from time to time and it is our responsibility to ensure that such matters, whether related to our products, services, conduct, or internal practices, are handled with sensitivity and confidentially in a timely, fair, and consistent manner by providing a clear channel for feedback and redressal.

We encourage its use as a constructive tool for maintaining a harmonious and productive environment and identify areas for systemic improvement, enabling us to enhance our service quality and strengthen governance

## 3. Grievance Redressal Officer (GRO) and Principal Nodal Officer (PNO)

The appointment of the GRO / PNO shall be by The Board of Directors of the Company. The GRO / PNO shall be responsible for overall functioning of the Grievance Redressal Mechanism of the Company.

The GRO’s key roles and responsibilities include:

- Monitoring and ensuring timely resolution of complaints received through various channels.
- Reviewing the pattern and nature of complaints to identify root causes and recommending corrective and preventive actions.
- Coordinating with internal departments to facilitate prompt and appropriate responses to grievances.
- Ensuring fair, transparent, and consistent handling of complaints in line with regulatory and internal standards.
- Submitting periodic reports on grievance trends and resolution effectiveness to the Board for necessary policy or process improvements.

In addition to the above, the PNO will have the following additional roles and responsibilities:

- Representing the Company and furnishing information to the RBI Ombudsman in relation to complaints filed against the Company.
- Ensure that feedback received from the Internal Ombudsman is implemented.
- Ensuring the name, contact number, email ID of the PNO, and the RBI Ombudsman complaint portal (<https://cms.rbi.org.in>) are prominently displayed at the office and on the website.
- Appoint such other Nodal Officers to assist the PNO as it may deem fit for operational efficiency.

The contact details of the GRO / PNO are mentioned below:

Name	Behzad Bhesania
Designation	Grievance Redressal Officer / Principal Nodal Officer
Postal address	A - 1001, Peninsula Business Park, Senapati Bapat Marg, Lower Parel, Mumbai 400013
Contact details	Email :- <a href="mailto:behzadbhesania@climatefinanceindia.com">behzadbhesania@climatefinanceindia.com</a> Contact number :- +91 89766 66604

#### 4. Grievance Redressal Mechanism

The Company shall record all communications / interactions with various stakeholders through a structured grievance redressal mechanism. All interactions shall be further classified based on its nature as Query, Request or Complaint (Q / R / C) and assigned to the appropriate customer service manager or customer relationship manager responsible to resolve the same. Further an escalation matrix is defined where the issue is not resolved within the stipulated Turn Around Time (TAT). The Grievance Redressal mechanism shall include communications / interactions with the external agencies as would have been appointed by the company for the purpose.

For instance, an issue may be categorised as a complaint in case of dissatisfaction regarding the quality of interaction, Intolerant behaviour of a Company employee / representative (including misrepresentation, favours, bribe etc), Delay in committed support to be offered or service or process that requires investigation and resolution

##### 4.1 Lodging / Registration of the Issue:

We have enabled multiple channels for our stakeholders to log in their issues:

Walk in (Office location)	1001, Tower A, Peninsula Business Park, Senapati Bapat Marg, Lower Parel, Mumbai 400013
Written communication to postal address	
Digital @ Email	<a href="mailto:behzadbhesania@climatefinanceindia.com">behzadbhesania@climatefinanceindia.com</a> Compliance@climatefinanceindia.com
Digital @ Website	Under development

The Company shall communicate the same through its website, application form, loan disbursement form, email or any other mode of communication from time to time.

**Acknowledgement:** An acknowledgment shall be shared with the complainant / borrower within 1 working day of receiving the complaint. The manner of sharing acknowledgment may be physical or electronic based mode of receipt of complaint. Where complaint is over a voice call, the acknowledgment shall be provided on the registered email address.

For complaints, queries or requests lodged in writing / through physical modes, the Company may provide a form / template.

**Resolution:** The Company shall address queries and requests received from the borrowers and shall provide appropriate and timely responses. In the event of grievance, the team shall take necessary steps to resolve the issue efficiently. The Company shall monitor the status of the query, request, complaint and provide an update to the borrowers.

#### 4.2 Escalation Mechanism

If the borrower is not satisfied with the response or does not receive any response within 7 working days since the complaint registration, the borrower may escalate the matter in line with the escalation matrix given below. Depending on the query, request or grievance, a written response will be sent to the borrower within the timelines prescribed in the table given below at the borrower's registered e-mail address or via post.

The escalation matrix along with timeline for resolution is given below; borrower / stakeholder shall be made aware of this through the website and regular communications

Level of Escalation	Official to be approached	TAT for resolution	Contact details
First	Grievance Redressal Officer / Principal Nodal Officer	15 working days (from the date of escalation to GRO / PNO)	Email <a href="mailto:behzadbhesania@climatefinanceindia.com">behzadbhesania@climatefinanceindia.com</a> Contact Number 89766 66604
Second	Compliance Officer / Director / Managing Director	15 working days (from the date of escalation to CCO, / Director / MD)	Email :- Compliance@climatefinanceindia.com
Third	RBI Complaint Management System as per the Integrated Ombudsman Scheme	-	Email ;- <a href="https://cms.rbi.org.in">https://cms.rbi.org.in</a>

If a case requires additional time, the Company or the grievance redressal representative will inform the borrower of the reasons for delay and provide regular updates on the progress of the resolution.

Integrated Ombudsman Scheme: If the borrower's complaint is not redressed within a period of 30 days from date of receipt of complaint, the borrower may file an appeal with the Ombudsman in accordance with The Integrated Ombudsman Scheme, 2021 as applicable from time to time.

The borrowers can also file their complaints on the Complaint Management System ("CMS") launched by the RBI. The web address of the online portal is: <https://cms.rbi.org.in>

#### 5. Redressal of Grievances related to Outsourced Services

- i. Outsourcing arrangements entered into by the Company shall not affect the rights of its customers against the Company, including the ability of the customers to obtain redressal as applicable under relevant laws.
- ii. In cases where customers are required to deal with a service provider in the process of dealing with the Company, the Company shall incorporate a clause in the corresponding product literature and brochures, stating that services of the service provider, including in

sales, and marketing of the products, may be used. The role of the service provider may be indicated in broad terms.

- iii. The Company shall have a robust grievance redressal mechanism that shall not be compromised in any manner on account of outsourcing, i.e., responsibility for redressal of customers' grievances related to outsourced services shall rest with the Company.
- iv. In addition to the above,
  - The Company shall constitute Grievance Redressal Machinery in accordance with the provisions of Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025
  - At the operational level, the Company shall display the name and contact details (Telephone / Mobile Nos. as also email address) of the Grievance Redressal Officer prominently at its branches / places where business is transacted. The designated officer shall ensure that genuine grievances of customers are redressed promptly without involving delay. It shall be clearly indicated that the Company's Grievance Redressal Machinery will also deal with the issue relating to services provided by the outsourced agency
  - The Company shall give a time limit of 30 days to the customers for preferring their complaints or grievances. The grievance redressal procedure of the Company and the time frame fixed for responding to the complaints shall be placed on the Company's website; and
  - If a complaint is rejected wholly or partly by the Company and the complainant is not satisfied with the reply or does not get any reply within 30 days, after the Company received the complaint, the complainant shall have the following options for redressal of their grievance(s):
    - the RBI's Ombudsman in case RBI's Integrated Ombudsman Scheme, 2021 applies to the Company, or
    - Consumer Education and Protection Cell (CEPC) of respective Regional Office of RBI in case RBI's Integrated Ombudsman Scheme, 2021 does not apply.

## 6. Display of information

The Company shall display the following grievance redressal related information on its website and / or physical notice board of its office:

- The procedure for lodging a complaint including the modes available
- The name, designation, contact number and email address of the GRO and PNO.
- The expected time frame for resolving complaints along with the escalation matrix and contact details at each level.
- Information about the process for escalating unresolved complaints to the RBI Ombudsman, including relevant contact details and links to the RBI's CMS portal.
- Salient features of the Integrated Ombudsman Scheme shall be displayed on the website. The same shall also be displayed in the office locations in English, Hindi and the regional language.
- The details of the Officer-in-Charge of the Regional Office of DNBS of the RBI, under whose jurisdiction the registered office of the Company falls.

## **7. Awareness and Internal Training**

Adequate efforts shall be made towards creation of awareness about the grievance redressal mechanism. The Company shall provide appropriate and regular training to all its employees on handling of borrower / stakeholder interactions and grievances.

The training shall be customized for teams that directly interact with the borrowers, partners, and stakeholders. Where technology is used for recording interactions, appropriate training shall be provided to use the technology. The Staff will be trained to ensure that all complaints whether received through various channels or redirected by other teams are properly logged and diligently tracked through to resolution.

## **8. Record Management**

All interactions in the nature of a query, request or complaint should be recorded. Acknowledgments and all subsequent communications / responses should be recorded and maintained for the duration as per the Record Management Policy of the Company.

## **9. Quality Assurance**

Based on the quantum of complaints received, the Company may consider putting in place appropriate quality assurance checks to review that all customer interactions and communications are as per regulatory guidelines and expected standards set by the Company.

## **10. Reporting**

Periodic reports shall be presented to the Board of Directors after they are reviewed by the PNO and the respective department heads. The reports ( Annexure II) shall at minimum cover the following:

- A summary of the number of complaints, queries and requests received, resolved or pending
- Nature or theme of complaints received with corresponding ageing on resolution and outstanding
- The top five most frequently occurring complaints
- Summary of complaints received through the RBI Ombudsman including details such as total number of complaints received, number of complaints resolved, resolution type, escalation levels, etc.

## **11. Review of Policy**

The Board of Directors shall lay down the appropriate grievance redressal mechanism within the organization. Such a mechanism shall ensure that all disputes arising out of the decisions of the lending institution's functionaries are heard and addressed at least at the next higher level.

A consolidated report for periodical review of the functioning of the Policy at various levels of management shall be submitted to the Board of Directors at regular intervals.

The policy will be reviewed and amended by the Board as and when required or atleast once every year for incorporating changes and regulatory updates to the policy.

In case of any inconsistency between the provisions of this Policy and applicable regulations, the regulations shall prevail and supersede the Policy.

## References

### References to key RBI circulars

No.	Circular	Latest Issue Date
1	Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025	November 28, 2025
2	Integrated Ombudsman Scheme, 2021	November 12, 2021

## Form for Registration / Escalation to The Grievance Redressal Officer

To The Grievance Redressal Officer,

Madam/Sir,

Sub: Complaint against .....

(Name and place of Regulated Entity &amp; office)

Personal Details / Information	
Name of the Person	
Name of the Entity / Company	
Full Postal address of the Company Incl. PINCODE	
Contact Details (Mobile number) and (Registered email id)	

Service / Interaction details	
Nature of Relationship with the Entity	
Loan account number / (OR) Borrower unique ID (as applicable)	
Servicing Relationship Manager / Representative of the Company	
Reference Facility / Transaction details (Transaction ID - CIF / Contract No., Amount, Date, etc.,)	

Issue log	
Date of Issue	
Date of Issue Logged with the Company	(Please enclose a copy)
Whether any reminder was sent	Yes / No (Please enclose a copy)
Subject matter of the Issue / Interaction	
Nature the Issue / Interaction - a general issue or against Management / Executive of the Company?	

Brief Description of the Issue / Interaction	
Supporting Documents / Evidence attached (if any, such as screenshots, receipts, communication records)	
Relief sought from the Company	
Whether any reply has been received from the Company.	(Please enclose a copy)

List of documents enclosed:

1. ....
2. ....
3. ....
4. ....
5. ....
6. ....
7. ....
8. ....
9. ....
10. ....

**Declaration**

I/We, ....., the undersigned being authorised executives of (Company Name) ..... herein declare that: a) the information furnished above is true and correct and b) I/We have not concealed or misrepresented any fact stated above, and in the documents submitted herewith.

Signature: \_\_\_\_\_  
Name: \_\_\_\_\_  
Place: \_\_\_\_\_

## i. Summary of Complaints, Queries, and Requests

Month / Quarter	Total Queries Received	Total Requests Received	Total Complaints Received	Resolved within TAT	Pending
				[Number / %] for Q, R and C separately	For Q, R, C separately

## ii. Types of Complaints received with corresponding ageing

Complaint Category	Total Received	Resolved (<7 days)	Resolved (8-15 days)	Resolved (15-30 days)	Resolved (> 30 days)	Pending (> 30 days)
-						
-						
-						
<b>Total</b>						

## iii. Top five most frequently occurring Issues / Complaints

Rank	Issue / Complaint Category	No. of Complaints	% of Total Complaints	Remarks (if any)
1				
2				
3				
4				
5				

## iv. Summary of Complaints received through the RBI Ombudsman

RBI ref. no.	Date received	Nature of complaint	Resolution status	Date Resolved	Mode of Resolution	Escalated (Y/N)
-						
-						
-						
<b>Total</b>						

Summary	Complaints Received by the Company	Complaints Received through RBI Ombudsman
Total count		
Resolved		
Pending		
Escalated		
Average resolution time		

## Internal Ombudsman

The Company shall comply with the Master Direction – RBI (Internal Ombudsman for Regulated Entities) Directions, 2023 (Reference: RBI/CEPD/2023-24/108 CEPD.PRD.No.S1228/13.01.019/2023-24), as and when applicable to the Company.

Following are the key aspects of the guidelines:

Applicability: The guidelines are applicable to the following NBFCs:

- i. Deposit-taking NBFCs (NBFCs-D) with 10 or more branches
- ii. Non-Deposit taking NBFCs (NBFCs-ND) with asset size > Rs.5,000 crore and having public customer interface.

Appointment of IO:

The Internal Ombudsman (IO) shall either be a retired or serving officer, in the rank equivalent to a General Manager of another bank / Financial Sector Regulatory Body / NBSP / NBFC / CIC, having necessary skills and experience of minimum 7 years of working in areas such as banking, non-banking finance, regulation, supervision, payment and settlement systems, credit information or consumer protection. The IO shall not be over 70 years of age before the completion of the tenure.

Appointment of Deputy IO:

The Company may appoint one or more Deputy IO depending on the volume of complaints received by them, who would assist the IO in the quality disposal of the complaints. The Deputy IO shall either be a retired or serving officer, not below the rank of Deputy General Manager of another bank / Financial Sector Regulatory Body / NBSP / NBFC / CIC, having necessary skills and experience of minimum 5 years of working in areas such as banking, non-banking finance, regulation, supervision, payment and settlement systems, credit information or consumer protection. The Deputy IO shall not be over 70 years of age before the completion of the tenure.

Tenure and Reappointment:

The appointment of the IO / Deputy IO shall be of a contractual nature. The tenure of the IO / Deputy IO shall be a fixed term of not less than 3 years but not exceeding 5 years. The IO / Deputy IO shall not be eligible for reappointment or for extension of term in the same Company. The tenure of the IO / Deputy IO shall be indicated in the appointment letter.

Reporting:

The IO shall report to the Competent Authority, as defined under clause 3(1)(c) of the Directions administratively, and to the Board of regulated entity functionally.

Role and Responsibilities:

The IO shall not handle complaints received directly from the complainants or members of the public but deal with the complaints that have already been examined by the Company but have been partly or wholly rejected by the Company.

Procedure for Complaint Redress by IO:

The Company shall formulate an SOP approved by the Committee of the Board handling Customer Service and Protection and establish a fully automated Complaints Management Software wherein

all complaints that are partly or wholly rejected by the Company's internal grievance redress mechanism are auto-escalated to the IO within 20 days of receipt, for a final decision. The IO and Company shall ensure that the final decision is communicated to the complainant within a period of 30 days from the date of receipt of complaint by the Company.